



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd Floor
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October 9, 2020

BY ECF

Hon. Victor Marrero, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write on behalf of all of the parties, pursuant to the Court's Decision and Order issued on October 8, 2020 (ECF No. 81) (the "Order"), directing the parties to confer and attempt to reach agreement on two specific remaining issues relating to the Supplemental Guidance Document. In compliance with the Order, the parties conferred by telephone and email today, and were able to reach agreement on both issues, as set forth below.

On the first issue, which is discussed in pages 5 to 6 of the Order, the parties have agreed to the following language, which replaces the fifth full bullet point on page 2 of Defendants' revised proposed Supplemental Guidance Document (ECF No. 77-1): "Extra delivery and collection trips are authorized and instructed to be used to ensure that completed ballots reach the appropriate election official by the state's designated deadline."

On the second issue, which is discussed in pages 6 to 7 of the Order, the parties have agreed to the following language, which replaces the relevant sentence on page 3 of Defendants' revised proposed Supplemental Guidance Document (ECF No. 77-1): "Authorizing late and extra trips that facilitate the on time delivery of Election Mail will not result in disciplinary action."

For the Court's convenience, the parties attach hereto a clean Supplemental Guidance Document reflecting the Court's rulings in the Order and the parties' agreements set forth herein. *See* Exhibit A (clean); Exhibit B (redline pointing out the parties' agreements set forth herein as compared against ECF No. 77-1).

The parties thank the Court for its consideration of these issues.

Page 2 of 2

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Respectfully,

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